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Levert Lyons

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
(Portland Division)

LEVERT LYONS,
Plaintiff,

Civil No. 3:09-cv-01183-AC

**PLAINTIFF LEVERT LYONS' CROSS
MOTION FOR ENTRY OF JUDGMENT**

v.

NIKE, INC.,
Defendant.

LOCAL RULE 7-1 COMPLIANCE

This Court in its Opinion and Order of June 7, 2012 GRANTED Defendant NIKE, Inc.'s ("Nike") motion for summary judgment of noninfringement, DENIED Nike's motion for summary judgment as to invalidity, and denied as moot Plaintiff Levert Lyons' ("Lyons") motion for partial summary judgment as to intentional infringement. (See Dkt. No. 136, Summary Judgment Order.) Since then, Lyons' counsel has diligently conferred with counsel for

Defendant Nike in an attempt to resolve all outstanding issues remaining in this case, including agreeing to a motion for entry of final judgment. The parties, however, have not been able to do so. Consequently, counsel for Lyons certifies that the parties made a good faith effort to resolve the dispute, and have been unable to do so.

MOTION

Plaintiff Levert Lyons ("Lyons") hereby cross moves this Court for entry of Final Judgment in the form annexed hereto as Exhibit A, together with such other and further relief as the Court deems proper. A Memorandum of Law in support of this cross motion is submitted herewith.

Lyons requests the opportunity to file and serve reply papers according to a schedule consistent with the foregoing.

Respectfully submitted

Dated: August 17, 2012

/s/ **JOHN P. COWART**

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